

MEMO ENDORSED

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April 8, 2013

4/8/13
SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Honorable Alison J. Nathan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Shedesha Brown and Gabriel Perez
vs. The City of New York et al.
Docket No. 11CV1068(AJN)

Your Honor:

I represent the plaintiff in the captioned matter. I am writing to request an extension of the time to file proposed jury instructions, a verdict form, and motions *in limine* in this matter to April 12, 2013. Martin Bloor, Esq. of Pepper Hamilton LLP, the attorneys for the defendants, does not object to this extension.

At a conference held on February 25, 2013, Your Honor scheduled the trial of this matter for May 28, 2013, and directed the parties to submit pretrial materials by April 8, 2013.

The parties expect to file a joint pre-trial order and proposed voir dire questions today. I have been working assiduously to complete those documents as well as proposed jury instructions, but believe that it will not be possible to resolve differences between the defendants' and plaintiff's versions and submit a final version today. Please note that in the same time period I have been working on these documents, opposition to the defendants' *Daubert* motion also was prepared. I also anticipate submitting a motion *in limine*.

The plaintiff therefore respectfully requests that Your Honor grant a short extension of the time to submit proposed jury instructions, a verdict form, and motions *in limine* to April 12, 2013.

Respectfully submitted,



Eugene M. Bellin

EMB:b

cc: Martin Bloor, Esq. (by E-mail)
Linda Regis-Hallinan, Esq. (by E-mail)
Lawrence Byrne, Esq. (by E-mail)
Chris Howard, Esq. (by E-mail)
Steven Mark Silverberg, Esq. (by E-mail)

SO ORDERED. Pretrial materials shall
be submitted by April 12, 2013.